

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

STEVE WASSERMAN, D/B/A, LCW	)	
ENTERPRISES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 11-cv-7251
	)	
VINCENT A. CARLOS, Individually	)	Honorable Judge Edmund Chang
and L.J. TRADING LLC, a California	)	
limited liability company,	)	Magistrate Jeffrey Cole
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR ENTRY  
OF A JUDGMENT IN SUM CERTAIN**

Plaintiff, Steve Wasserman, d/b/a LCW Enterprises, Inc. by his attorneys Schoenberg Finkel Newman & Rosenberg, LLC., moves this Honorable Court for the entry of a Judgment against Defendants, Vincent A. Carlos, individually and L.J. Trading LLC., states as follows:

1. On November 15, 2011 this Honorable Court pursuant to Plaintiff's Rule 55 Motion entered a Default Judgment against Defendants Vincent A. Carlos, individually and L. J. Trading, LLC.
2. Plaintiff seeks the entry of a Judgment in the amount of \$181,106.80 plus costs.
3. Attached hereto and made a part hereof as Exhibit 1 is the Affidavit of the Plaintiff, Steve Wasserman in support of this Motion for the entry of a Judgment for sum certain.

4. Vincent A. Carlos was served both personally and as agent for L.J. Trading, LLC at 10454 Chaparral Drive, Santee, California 92071 with a Summons and Complaint with respect to this matter (See Docket Nos. 4 and 5).

5. Pursuant to this Court's Order dated November 15, 2011 (attached as Exhibit 2), a copy of this Motion as well as a copy of the Docket entry and Order entered in this matter has been sent by regular and certified mail, return receipt requested to the Defendants at the herein-referenced address, to wit 10454 Chaparral Drive, Santee, California 92071.

6. Attached hereto as Exhibit 3 is the Affidavit of George Sang which Affidavit reflects the amount of costs incurred with respect to the filing of the Complaint and the service of Summons on the Defendants.

7. Attached as Exhibit 4 is the Notice of Motion and Certificate of Service sent to the Defendants.

WHEREFORE, Plaintiff, Steve Wasserman, d/b/a LCW Enterprises, Inc., respectfully requests this Honorable Court for the entry of a Judgment Order in Plaintiff's favor and against the Defendants, Vincent A. Carlos, individually, and L.J. Trading, LLC, jointly and severally in the amount of \$181,561.80.

Respectfully submitted,

By: /s/ George E. Sang  
One of Plaintiff's Attorneys

George E. Sang  
Schoenberg Finkel Newman  
& Rosenberg, LLC  
222 South Riverside Plaza, Suite 2100  
Chicago, Illinois 60606  
(312) 648-2300